

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
PATRICIA HUNTER,

Plaintiff,

Case No. 1:16-cv-08779-ER

-against-

**ANSWER TO FIRST AMENDED
COMPLAINT**

PALISADES ACQUISITION XVI, LLC, SHARINN
& LIPSHIE, P.C., HARVEY SHARINN,
Defendants.

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Defendants, SHARINN & LIPSHIE, P.C. and HARVEY SHARINN (“Answering Defendants”), by their attorneys, Kaufman Dolowich & Voluck, LLP, set forth the following as and for its Answer to the Plaintiff’s First Amended Complaint:

1. Answering Defendants deny the allegations set forth in Paragraph “1” of the First Amended Complaint.
2. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “2” of the First Amended Complaint.
3. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “3” of the First Amended Complaint.
4. Answering Defendants deny the allegations set forth in Paragraph “4” of the First Amended Complaint.
5. Answering Defendants admit the truth of the allegations set forth in Paragraph “5” of the First Amended Complaint.
6. Answering Defendants deny the allegations set forth in Paragraph “6” of the First Amended Complaint.
7. Answering Defendants deny the allegations set forth in Paragraph “7” of the First Amended Complaint.

8. Answering Defendants deny the allegations set forth in Paragraph “8” of the First Amended Complaint.

PARTIES

9. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “9” of the First Amended Complaint.

10. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “10” of the First Amended Complaint.

11. Answering Defendants admit the truth of the allegations set forth in Paragraph “11” of the First Amended Complaint.

12. Answering Defendants deny the allegations set forth in Paragraph “12” of the First Amended Complaint.

13. Answering Defendants deny the allegations set forth in Paragraph “13” of the First Amended Complaint.

STATEMENT OF FACTS

14. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “14” of the First Amended Complaint.

15. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “15” of the First Amended Complaint.

16. Answering Defendants neither admit nor deny the allegations contained in Paragraph “16” of the First Amended Complaint and respectfully refer the Court to the document referenced therein for its contents.

17. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “17” of the First Amended Complaint.

18. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “18” of the First Amended Complaint.

19. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “19” of the First Amended Complaint.

20. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “20” of the First Amended Complaint.

21. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “21” of the First Amended Complaint.

22. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “22” of the First Amended Complaint.

23. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “23” of the First Amended Complaint.

24. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “24” of the First Amended Complaint.

25. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “25” of the First Amended Complaint.

26. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “26” of the First Amended Complaint.

27. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “27” of the First Amended Complaint.

28. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “28” of the First Amended Complaint.

29. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “29” of the First Amended Complaint.

30. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “30” of the First Amended Complaint.

31. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “31” of the First Amended Complaint.

32. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “32” of the First Amended Complaint.

33. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “33” of the First Amended Complaint.

34. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “34” of the First Amended Complaint.

35. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “35” of the First Amended Complaint.

36. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “36” of the First Amended Complaint.

37. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “37” of the First Amended Complaint.

38. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “38” of the First Amended Complaint.

39. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “39” of the First Amended Complaint.

40. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “40” of the First Amended Complaint.

41. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “41” of the First Amended Complaint.

42. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “42” of the First Amended Complaint.

43. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “43” of the First Amended Complaint.

44. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “44” of the First Amended Complaint.

45. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “45” of the First Amended Complaint.

46. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “46” of the First Amended Complaint.

47. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “47” of the First Amended Complaint.

48. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “48” of the First Amended Complaint.

49. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “49” of the First Amended Complaint.

50. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “50” of the First Amended Complaint.

51. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “51” of the First Amended Complaint.

52. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “52” of the First Amended Complaint.

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56. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “56” of the First Amended Complaint.

57. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “57” of the First Amended Complaint.

58. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “58” of the First Amended Complaint.

59. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “59” of the First Amended Complaint.

60. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “60” of the First Amended Complaint.

61. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “61” of the First Amended Complaint.

62. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “62” of the First Amended Complaint.

63. Answering Defendants deny the allegations set forth in Paragraph “63” of the First Amended Complaint.

64. Answering Defendants admit the truth of the allegations set forth in Paragraph “64” of the First Amended Complaint.

65. Answering Defendants admit the truth of the allegations set forth in Paragraph “65” of the First Amended Complaint.

66. Answering Defendants neither admit nor deny the allegations contained in Paragraph “66” of the First Amended Complaint and respectfully refer the Court to the document referenced therein for its contents.

67. Answering Defendants neither admit nor deny the allegations contained in Paragraph “67” of the First Amended Complaint and respectfully refer the Court to the document referenced therein for its contents.

68. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “68” of the First Amended Complaint.

69. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “69” of the First Amended Complaint.

70. Answering Defendants deny the allegations set forth in Paragraph “70” of the First Amended Complaint.

71. Answering Defendants deny the allegations set forth in Paragraph “71” of the First Amended Complaint.

72. Answering Defendants neither admit nor deny the allegations contained in Paragraph “72” of the First Amended Complaint and respectfully refer the Court to the document referenced therein for its contents.

73. Answering Defendants deny the allegations set forth in Paragraph “73” of the First Amended Complaint.

74. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “74” of the First Amended Complaint.

75. Answering Defendants deny the allegations set forth in Paragraph “75” of the First Amended Complaint.

76. Answering Defendants deny the allegations set forth in Paragraph “76” of the First Amended Complaint.

77. Answering Defendants deny the allegations set forth in Paragraph “77” of the First Amended Complaint.

78. Answering Defendants deny the allegations set forth in Paragraph “78” of the First Amended Complaint.

79. Answering Defendants deny the allegations set forth in Paragraph “79” of the First Amended Complaint.

80. Answering Defendants deny the allegations set forth in Paragraph “80” of the First Amended Complaint.

81. Answering Defendants admit the truth of the allegations set forth in Paragraph “81” of the First Amended Complaint.

82. Answering Defendants deny the allegations set forth in Paragraph “82” of the First Amended Complaint.

83. Answering Defendants admit the truth of the allegations set forth in Paragraph “83” of the First Amended Complaint.

84. Answering Defendants admit the truth of the allegations set forth in Paragraph “84” of the First Amended Complaint.

85. Answering Defendants admit the truth of the allegations set forth in Paragraph “85” of the First Amended Complaint.

86. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “86” of the First Amended Complaint.

87. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “87” of the First Amended Complaint.

88. Answering Defendants deny the allegations set forth in Paragraph “88” of the First Amended Complaint.

89. Answering Defendants deny the allegations set forth in Paragraph “89” of the First Amended Complaint.

90. Answering Defendants deny the allegations set forth in Paragraph “90” of the First Amended Complaint.

91. Answering Defendants deny the allegations set forth in Paragraph “91” of the First Amended Complaint.

92. Answering Defendants deny the allegations set forth in Paragraph “92” of the First Amended Complaint.

93. Answering Defendants deny the allegations set forth in Paragraph “93” of the First Amended Complaint.

94. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “94” of the First Amended Complaint.

95. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “95” of the First Amended Complaint.

96. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “96” of the First Amended Complaint.

97. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “97” of the First Amended Complaint.

98. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “98” of the First Amended Complaint.

99. Answering Defendants deny the allegations set forth in Paragraph “99” of the First Amended Complaint.

100. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “100” of the First Amended Complaint.

101. Answering Defendants deny the allegations set forth in Paragraph “101” of the First Amended Complaint.

102. Answering Defendants deny the allegations set forth in Paragraph “102” of the First Amended Complaint.

103. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “103” of the First Amended Complaint.

104. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “104” of the First Amended Complaint.

105. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “105” of the First Amended Complaint.

106. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “106” of the First Amended Complaint.

107. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “107” of the First Amended Complaint.

108. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “108” of the First Amended Complaint.

109. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “109” of the First Amended Complaint.

110. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “110” of the First Amended Complaint.

111. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “111” of the First Amended Complaint.

112. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “112” of the First Amended Complaint.

113. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “113” of the First Amended Complaint.

114. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “114” of the First Amended Complaint.

115. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “115” of the First Amended Complaint.

116. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “116” of the First Amended Complaint.

117. Answering Defendants deny the allegations set forth in Paragraph “117” of the First Amended Complaint.

118. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “118” of the First Amended Complaint.

119. Answering Defendants admit the truth of the allegations set forth in Paragraph “119” of the First Amended Complaint.

120. Answering Defendants admit the truth of the allegations set forth in Paragraph “120” of the First Amended Complaint.

121. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “121” of the First Amended Complaint.

122. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “122” of the First Amended Complaint.

123. Answering Defendants admit the truth of the allegations set forth in Paragraph “123” of the First Amended Complaint.

124. Answering Defendants admit the truth of the allegations set forth in Paragraph “124” of the First Amended Complaint.

125. Answering Defendants deny the allegations set forth in Paragraph “125” of the First Amended Complaint.

126. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “126” of the First Amended Complaint.

127. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “127” of the First Amended Complaint.

128. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “128” of the First Amended Complaint.

129. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “129” of the First Amended Complaint.

130. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “130” of the First Amended Complaint.

131. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “131” of the First Amended Complaint.

132. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “132” of the First Amended Complaint.

133. Answering Defendants deny the allegations set forth in Paragraph “133” of the First Amended Complaint.

134. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “134” of the First Amended Complaint.

135. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “135” of the First Amended Complaint.

136. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “136” of the First Amended Complaint.

137. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “137” of the First Amended Complaint.

138. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “138” of the First Amended Complaint.

139. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “139” of the First Amended Complaint.

140. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “140” of the First Amended Complaint.

141. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “141” of the First Amended Complaint.

142. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “142” of the First Amended Complaint.

143. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “143” of the First Amended Complaint.

144. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “144” of the First Amended Complaint.

145. Answering Defendants deny the allegations set forth in Paragraph “145” of the First Amended Complaint.

AS AND FOR AN ANSWER TO THE FIRST CLAIM FOR RELIEF

146. Answering Defendants repeat, reiterate and reallege each and every response set forth in Paragraphs “1” through “145” above, as if fully set forth at length herein.

147. Answering Defendants deny the allegations set forth in Paragraph “147” of the First Amended Complaint.

148. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “148” of the First Amended Complaint and refer all questions of law to this Honorable Court for its determination.

149. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “149” of the First Amended Complaint and refer all questions of law to this Honorable Court for its determination.

150. Answering Defendants deny the allegations set forth in Paragraph “150” of the First Amended Complaint.

151. Answering Defendants deny the allegations set forth in Paragraph “151” of the First Amended Complaint.

152. Answering Defendants deny the allegations set forth in Paragraph “152” of the First Amended Complaint.

AS AND FOR AN ANSWER TO THE SECOND CLAIM FOR RELIEF

153. Answering Defendants repeat, reiterate and reallege each and every response set forth in Paragraphs “1” through “152” above, as if fully set forth at length herein.

154. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “154” of the First Amended Complaint and refer all questions of law to this Honorable Court for its determination.

155. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “155” of the First Amended Complaint and refer all questions of law to this Honorable Court for its determination.

156. Answering Defendants deny the allegations set forth in Paragraph “156” of the First Amended Complaint.

157. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “157” of the First Amended Complaint.

158. Answering Defendants deny the allegations set forth in Paragraph “158” of the First Amended Complaint.

159. Answering Defendants deny the allegations set forth in Paragraph “159” of the First Amended Complaint.

160. Answering Defendants deny the allegations set forth in Paragraph “160” of the First Amended Complaint.

161. Answering Defendants deny the allegations set forth in Paragraph “161” of the First Amended Complaint.

162. Answering Defendants deny the allegations set forth in Paragraph “162” of the First Amended Complaint.

163. Answering Defendants deny the allegations set forth in Paragraph “163” of the First Amended Complaint.

164. Answering Defendants deny the allegations set forth in Paragraph “164” of the First Amended Complaint.

165. Answering Defendants deny the allegations set forth in Paragraph “165” of the First Amended Complaint.

166. Answering Defendants deny the allegations set forth in Paragraph “166” of the First Amended Complaint.

167. Answering Defendants deny the allegations set forth in Paragraph “167” of the First Amended Complaint.

168. Answering Defendants deny the allegations set forth in Paragraph “168” of the First Amended Complaint.

169. Answering Defendants deny the allegations set forth in Paragraph “169” of the First Amended Complaint.

AS AND FOR AN ANSWER TO THE THIRD CLAIM FOR RELIEF

170. Answering Defendants repeat, reiterate and reallege each and every response set forth in Paragraphs “1” through “169” above, as if fully set forth at length herein.

171. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “171” of the First Amended Complaint and refer all questions of law to this Honorable Court for its determination.

172. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “172” of the First Amended Complaint and refer all questions of law to this Honorable Court for its determination.

173. Answering Defendants deny having knowledge or information sufficient to form a belief as to the allegations set forth in Paragraph “173” of the First Amended Complaint and refer all questions of law to this Honorable Court for its determination.

174. Answering Defendants deny the allegations set forth in Paragraph “174” of the First Amended Complaint.

175. Answering Defendants deny the allegations set forth in Paragraph “175” of the First Amended Complaint.

176. Answering Defendants deny the allegations set forth in Paragraph “176” of the First Amended Complaint.

177. Answering Defendants deny the allegations set forth in Paragraph “177” of the First Amended Complaint.

178. Answering Defendants deny the allegations set forth in Paragraph “178” of the First Amended Complaint.

179. Answering Defendants deny the allegations set forth in Paragraph “179” of the First Amended Complaint.

AFFIRMATIVE DEFENSES

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

180. The Complaint fails to state a claim upon which relief may be granted.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

181. Plaintiff lacks standing to seek relief under the Fair Debt Collection Practices Act.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

182. The Complaint is barred by the applicable statute of limitations.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

183. Any alleged violation of the FDCPA was the result of a bona fide error.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

184. Plaintiff has not suffered any actual injury as a result of Answering Defendants’ alleged acts.

WHEREFORE, Answering Defendants hereby demand:

- a. Judgment dismissing the Complaint in its entirety and all causes of action purportedly pleaded therein, with prejudice;
- b. Costs and disbursements of this action, including attorneys' fees; and
- c. Such other and further relief as this Court deems just, equitable and proper.

Dated: Woodbury, New York
June 23, 2017

Yours, etc.,
Kaufman Dolowich & Voluck, LLP
Attorneys for Defendants
Sharinn & Lipshie, P.C. and Harvey Sharinn



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